



DIVISION OF  
CORPORATION FINANCE

UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
WASHINGTON, D.C. 20549

Mail Stop 3233

December 21, 2015

Via E-mail

Vincent Prince  
Chief Financial Officer  
South Beach Spirits, Inc.  
2690 Weston Road, Suite 200  
Weston, FL 33331

**Re: South Beach Spirits, Inc. (f/k/a CME Realty, Inc.)  
Form 8-K  
Filed August 31, 2015  
File No. 001-36549**

Dear Mr. Prince:

We have completed our review of your filing. We remind you that our comments or changes to disclosure in response to our comments do not foreclose the Commission from taking any action with respect to the company or the filing and the company may not assert staff comments as a defense in any proceeding initiated by the Commission or any person under the federal securities laws of the United States. We urge all persons who are responsible for the accuracy and adequacy of the disclosure in the filing to be certain that the filing includes the information the Securities Exchange Act of 1934 and all applicable rules require.

Sincerely,

/s/Tom Kluck

Tom Kluck  
Legal Branch Chief  
Office of Real Estate and  
Commodities

cc: Dale Bergman, Esq. (*via E-mail*)